

Hearing Date: February 21, 2008
Hearing Time: 10:00 a.m. (prevailing Eastern time)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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DEBTORS' OMNIBUS REPLY IN SUPPORT OF TWENTY-FIFTH
OMNIBUS OBJECTION PURSUANT TO 11 U.S.C. § 502(b) AND
FED. R. BANKR. P. 3007 TO (A) DUPLICATE OR AMENDED CLAIMS,
(B) UNTIMELY EQUITY CLAIM, (C) CLAIMS NOT REFLECTED ON
DEBTORS' BOOKS AND RECORDS, AND (D) CLAIMS SUBJECT TO
MODIFICATION AND LIFT STAY PROCEDURES

("DEBTORS' OMNIBUS REPLY IN SUPPORT OF TWENTY-FIFTH
OMNIBUS CLAIMS OBJECTION")

Delphi Corporation and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"),¹ hereby submit this Omnibus Reply In Support Of Twenty-Fifth Omnibus Objection Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To (A) Duplicate Or Amended Claims, (B) Untimely Equity Claim, (C) Claims Not Reflected On Debtors' Books And Records, And (D) Claims Subject To Modification And Lift Stay Procedures (Docket No. 12288) (the "Twenty-Fifth Omnibus Claims Objection"), and respectfully represent as follows:

1. The Debtors filed the Twenty-Fifth Omnibus Claims Objection on January 18, 2008, seeking entry of an order (a) disallowing and expunging certain "Claims," as that term is defined in 11 U.S.C. § 101(5), because (i) they were duplicative of other Claims or have been amended or superseded by later-filed Claims, (ii) one was filed by a holder of Delphi common stock solely on account of its stock holdings and was untimely filed pursuant to the Bar Date Order, and (iii) they assert liabilities or dollar amounts that are not reflected on the Debtors' books and records and (b) revising the asserted amount with respect to certain Claims, one of which is the subject of a pending settlement pursuant to the Order Approving Procedures For Modifying Automatic Stay Under 11 U.S.C. § 362 To Allow For (I) Liquidating And Settling And/Or (II) Mediating Of Certain Prepetition Litigation Claims entered by this Court on June 27, 2006 (Docket No. 4366).

2. The Debtors sent to each claimant whose proof of claim is subject to an objection pursuant to the Twenty-Fifth Omnibus Claims Objection a personalized Notice Of Objection To Claim, which specifically identified such claimant's proof of claim that is subject to an

¹ Capitalized terms used and not otherwise defined herein have the meanings ascribed to them in the Twenty-Fifth Omnibus Claims Objection.

objection and the basis for such objection. Responses to the Twenty-Fifth Omnibus Claims Objection were due by 4:00 p.m. (prevailing Eastern time) on February 14, 2008.

3. As of February 19, 2008 at 12:00 p.m. (prevailing Eastern time), the Debtors had received one timely-filed formal docketed response (the "Response") to the Twenty-Fifth Omnibus Claims Objection that was filed by Sumida America Inc. ("Sumida") (Docket No. 12628). Sumida disagrees with the Twenty-Fifth Omnibus Claims Objection to disallow and expunge proof of claim number 10372, asserted in the amount of \$79,613.00 (of which \$77,000.00 was a secured claim and \$2,613.00 was an unsecured claim). Sumida asserts that the Debtors have failed to produce any evidence sufficient to overcome the prima facie validity of Sumida's claim.

4. Pursuant to the Order Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 2002(m), 3007, 7016, 7026, 9006, 9007, And 9014 Establishing (i) Dates For Hearings Regarding Objections To Claims And (ii) Certain Notices And Procedures Governing Objections to Claims (Docket No. 6089) entered on December 6, 2006 (the "Claims Objection Procedures Order"), the hearing with respect to Sumida's Claim will be adjourned to a sufficiency hearing or claims objection hearing, as appropriate, to determine the disposition of the Claim.

5. Attached hereto as Exhibit A is the revised proposed order (the "Revised Proposed Order"),² which reflects the adjournment of the hearing with respect to the Claim for which the Response was filed. The Debtors request that the Court grant the relief requested by the Debtors and enter the Revised Order.

² Attached hereto as Exhibit B is a copy of the Revised Order marked to show revisions to the form of proposed order that was submitted with the Twenty-Fifth Omnibus Claims Objection.

WHEREFORE the Debtors respectfully request that this Court enter an order (a) sustaining the Twenty-Fifth Omnibus Claims Objection, subject to the modifications made to the Revised Order, (b) adjourning the hearing with respect to Sumida's Claim and (c) granting the Debtors such other and further relief as is just.

Dated: New York, New York
February 20, 2008

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